

RECEIVED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 APR 30 PM 4:02

ISAAC Lee HYKES
P.O. Box 140612
Memphis, TN: 38114
(Name of plaintiff or plaintiffs)

CIVIL ACTION NO. _____

^{v.}
Timothy F. Geithner
Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220
(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Isaac Lee HYKES
(name of plaintiff)

is a citizen of the United States and resides at P.O. Box 140612
(street address)

Memphis Shelby TN.
(city) (country) (state)
38114 (901) 502-0277
(zip code) (telephone number)

3. Defendant Timothy F. Geithner
(defendant's name)

lives at, or its business is located at Department of the Treasury
(street address)
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

4. Plaintiff sought employment from the defendant or was employed by the defendant at
Internal Revenue Service 5333 Getwell Road
Memphis, TN Shelby TN. 38118
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about November 28, 2007

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 29 November 2007

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 19 December 2007 (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ___ race, (2) ___ color, (3) ☒ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ___ terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) I was discriminated against on the basis of sex (male) and subjected to a hostile work environment, reprisal, and disparate treatment when on November 28, 2007, my request to take five and a half (5 1/2) hours of sick leave was denied.

10. The circumstances under which defendant discriminated against plaintiff were as follows: Concerning claim 1: because of my male gender and prior EEO complaints, my manager, Angela Echols and department manager Annie Dortch, denied my request to take 5 1/2 hours of sick leave on November 28, 2007. Concerning claim 2: because of my male gender and prior EEO complaints, my manager Angela Echols and department manager, Annie Dortch, unfairly issued me a written directive to change my input duty day to January 11, 2008. Concerning claim 3: because of my male gender and prior EEO complaints, my manager, Angela Echols and department manager Annie Dortch changed my work assignment from January 14, 2008 through January 17, 2008 so that I had to perform the Form 3210 duties.

11. The acts set forth in paragraph 9 of this complaint

- (a) X are still being committed by defendant.
- (b) _____ are no longer being committed by defendant.
- (c) _____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, or
- (b) _____ Defendant be directed to re-employ plaintiff, or
- (c) _____ Defendant be directed to promote plaintiff, or;
- (d) _____ Defendant be directed to pay plaintiff \$12,565.53 for all actual out of pocket expenses, \$300,000.00 in compensatory damages, and all other pecuniary and non-pecuniary damages.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (X) No ()

Isaac Lopez April 30, 2013
SIGNATURE OF PLAINTIFF